

CC Docket No. 94-102 – January 2004 E911 Interim Report

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Date: January 15, 2004

To: Marlene H. Dortch, Secretary
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By Electronic Submission:

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**TIER III CARRIER INTERIM REPORT
AS OF JANUARY, 2004
CC Docket No. 94-102**

Prairie Wireless, L.L.C. ("Prairie") hereby submits its E911 Interim Report, pursuant to *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers*, CC Docket No. 94-102, FCC 02-210, released July 26, 2002 (*Non-Nationwide Carrier E911 Order*), *Public Notice*, DA 03-2113, released June 30, 2003, and *Order to Stay*, FCC 03-241, released October 10, 2003.

Carrier Identifying Information:

Carrier Name: Prairie Wireless, L.L.C. – FRN 0008-8250-93

E911 Compliance Officer: John D. Champagne
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Plano, TX 75074

E911 Implementation Information:

Prairie is a "Tier III" wireless carrier, as defined in the Commission's decision in *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers*, 17 FCC Rcd. 14841 (2002) (*"Small Carrier E911 Extension"*).¹ Prairie has temporarily ceased operations, but like its predecessor, previously offered PMRS service only.² Prairie and its predecessor each operated as a "carriers' carrier", and when Prairie resumes service it intends to continue operating as a carriers' carrier and will not have any subscribers. Based on this premise, Prairie hereby reports as follows:

- ☐ Prairie has not received any Phase I or Phase II requests from PSAPs. Prairie has obtained and installed all of the equipment and software necessary to meet any Phase I request from a PSAP. Additionally, Prairie has retained the services of Intrado, Inc., as a consultant to assist it in contacting and working with any PSAP in its market that may request Phase I E911. Intrado is one of the most respected names in the E911 industry. Most of its personnel have over twenty years of experience working for PSAPs or in the PSAP field. Prairie is dependent on a landline between the switch and the requesting PSAP for Phase I deployment, and will have to work with the local exchange carrier ("LEC") to have a landline installed when the time comes. Prairie's system operates in remote, rural areas, and it can take a LEC as long as 12 or even 18 months to install a new landline in a rural area. Thus, there is the substantial possibility that a PSAP's request would remain outstanding longer than six

¹ On August 1, 2003, Commnet Capital, L.L.C., assigned its PCS licenses to Prairie.

² The system was not interconnected.

months while Prairie awaits the installation of a landline connection to the PSAP. Notably, because Prairie has no subscribers, Prairie does not have the means to fund any Phase I implementation and recurring costs via subscriber pass-throughs.

- ☐ Prairie elected a handset-based solution.
- ☐ Prairie anticipates a significant problem with its Phase II E911 deployment. There is currently no Phase II-compliant handset-based solution available for either TDMA or GSM, and it appears that one will not become available any time in the near future. Moreover, Prairie is unable to switch to a network-based solution, because it is technically impossible. The only Phase II-compliant network-based solutions available are based on either triangulation techniques, which can work only when the network is receiving location information on the involved mobile unit from three different cell sites, or angle of arrival techniques (“AOA”), which can work only when the network is receiving location information from at least two different cell sites.

Prairie is licensed only in remote, rural areas where population density is low and the cell sites are spread far apart. Only a small portion of Prairie’s service area will ever be susceptible to either triangulation or AOA techniques; the bulk of the service area is not susceptible to such techniques. Therefore, even if Prairie were to implement Phase II E911, it would never be able to reach the required 95% accuracy level on a system-wide basis, as prescribed by §20.18 of the Commission’s rules.

- ☐ Prairie does not anticipate that full Phase II service will ever be available in its network, for the reasons discussed above. Prairie has a request pending with the Commission for a permanent waiver of the Phase II requirements.
- ☐ With regard to meeting the ultimate implementation date of December 31, 2005, see above.